

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
)	
)	Case no. 01-01139 (JFK)
W.R. GRACE & CO., <i>et al.</i> ,)	Jointly Administered
)	
Debtors)	Related Docket Nos.: : 15703, 15705, 15707,
)	15709, 15711, 15713, 15715, 15717, 15719,
)	15721, 15723, 15730, 15732, 15734, 15735,
)	15738, 15740, 15741, 15744, 15746, 15748,
)	15950, 15955, 15959, 15966, 15987 & 16059
)	
)	Hearing Date: July 23, 2007 @ 2:00 p.m. in
)	Wilmington, Delaware
)	
)	Related Agenda Item No. 19

**CERTIFICATION OF COUNSEL REGARDING ORDER GRANTING DEBTORS'
MOTION FOR AN ORDER AUTHORIZING DEBTORS TO, AND DIRECTING THAT
THE CLERK OF THE COURT, FILE UNDER SEAL DEBTORS' BRIEF IN FURTHER
SUPPORT OF OPPOSITION TO MOTIONS FOR PROTECTIVE ORDERS TO
PRECLUDE LAW FIRM DEPOSITIONS**

1. On July 19, 2007, the Debtors filed the *Debtors' Motion for an Order Authorizing Debtors to, and Directing that the Clerk of the Court, File Under Seal Debtors' Brief in Further Support of Opposition to Motions for Protective Orders to Preclude Law Firm Depositions* [Docket No. 16319].

2. Attached hereto as Exhibit A is the proposed form of Order Granting Debtors' Motion for an Order Authorizing Debtors to, and Directing that the Clerk of the Court, File Under Seal Debtors' Brief in Further Support of Opposition to Motions for Protective Orders to Preclude Law Firm Depositions (the "Order").

3. The Debtors respectfully request that the Court enter the attached Proposed Order at its earliest convenience.

Dated: July 19, 2007

KIRKLAND & ELLIS LLP
David M. Bernick
Janet S. Baer
200 East Randolph Drive
Chicago, IL 60601-6636
Telephone: (312) 861-2000
Facsimile: (312) 861-2200

and

PACHULSKI STANG ZIEHL YOUNG JONES
& WEINTRAUB LLP

/s/James E. O'Neill

Laura Davis Jones (Bar No. 2436)
James E. O'Neill (Bar No. 4042)
Timothy P. Cairns (Bar No. 4228)
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705
Telephone: (302) 652-4100
Facsimile: (302) 652-4400

Co-Counsel for the Debtors and Debtors in Possession